

Honorable David G. Estudillo

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

JENNIFER WYSOCKI, ANDREW SIDHU  
and BETSY KELLOGG, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

ZOOMINFO TECHNOLOGIES INC.,  
DISCOVERORG, LLC, ZOOM  
INFORMATION, INC., ZOOMINFO  
TECHNOLOGIES LLC, ZOOMINFO  
HOLDINGS LLC, ZOOMINFO  
INTERMEDIATE HOLDINGS LLC, and  
ZOOMINFO INTERMEDIATE INC.,

Defendants.

Case No. 3:22-cv-05453-DGE

STIPULATED MOTION AND  
[PROPOSED] ORDER FOR  
EXTENSION OF DEADLINE TO  
RESPOND TO AMENDED CLASS  
ACTION COMPLAINT AND BRIEFING  
SCHEDULE

Note on Motion Calendar: September 15,  
2022

**STIPULATION**

Plaintiffs Jennifer Wysocki, Andrew Sidhu, and Betsy Kellogg (“Plaintiffs”) and Defendants ZoomInfo Technologies LLC, ZoomInfo Technologies Inc., Zoom Intermediate Inc., and ZoomInfo Holdings LLC (“Defendants”), by their undersigned counsel, hereby agree that:

WHEREAS, on June 21, 2022, Plaintiff Jennifer Wysocki filed a Class Action Complaint (ECF No.1);

WHEREAS, on August 17, 2022, this Court issued an Order regarding deadlines for

STIPULATED MOTION AND [PROPOSED]  
ORDER FOR EXTENSION OF DEADLINE  
Case No. 3:22-cv-05453-DGE

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1 Initial Disclosures, Joint Status Report, and set a Scheduling Conference for November 21, 2022  
 2 (ECF No.10);

3 WHEREAS, on August 18, 2022, Plaintiff Jennifer Wysocki and new Plaintiffs Andrew  
 4 Sidhu and Betsy Kellogg filed an Amended Class Action Complaint, naming as Defendants  
 5 ZoomInfo Technologies Inc., DiscoverOrg LLC, Zoom Information, Inc., ZoomInfo  
 6 Technologies LLC, ZoomInfo Holdings LLC, ZoomInfo Intermediate Holdings LLC, and  
 7 ZoomInfo Intermediate Inc. (ECF No.11);

8 WHEREAS, on August 26, 2022, Plaintiffs served the summons and Amended Class  
 9 Action Complaint on ZoomInfo Technologies LLC and thus Defendant ZoomInfo Technologies  
 10 LLC's current deadline to respond to the Amended Class Complaint is September 16, 2022;

11 WHEREAS, on August 30, 2022, Plaintiffs served the summons and Amended Class  
 12 Action Complaint on ZoomInfo Intermediate Inc. and thus Defendant ZoomInfo Intermediate  
 13 Inc.'s current deadline to respond to the Amended Class Complaint is September 20, 2022;

14 WHEREAS, on September 1, 2022, Plaintiffs served the summons and Amended Class  
 15 Action Complaint on ZoomInfo Technologies, Inc. and thus Defendant ZoomInfo Technologies,  
 16 Inc.'s current deadline to respond to the Amended Class Complaint is September 22, 2022;

17 WHEREAS, on September 14, 2022, undersigned counsel, being so authorized, accepted  
 18 service of the Amended Class Action Complaint on behalf of ZoomInfo Holdings, LLC;

19 WHEREAS, the Parties have agreed that a short extension of time for Defendants to  
 20 respond to the Amended Class Action Complaint is appropriate to afford Defendants and counsel  
 21 sufficient time to investigate the allegations contained in the Amended Class Action Complaint  
 22 and to formulate its legal strategy and defenses;

23 WHEREAS, counsel for Defendants have notified Plaintiffs' counsel of Defendants'  
 24 intent to file a motion to dismiss and motion to strike;

25 WHEREAS, counsel for Plaintiffs have notified Defendants' counsel of their intent to  
 26 file an amended complaint to include an additional plaintiff;

27 NOW THEREFORE, the Parties agree and stipulate to extend the deadline for  
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Defendants to respond to the Amended Class Action Complaint to October 28, 2022. The Parties further stipulate and agree to the following briefing schedule:

Pleading	Stipulated Deadline
Defendants' Motion to Dismiss and Motion to Strike	October 28, 2022
Plaintiffs' Responses to Motion to Dismiss and Motion to Strike	December 2, 2022
Defendants' Replies ISO Motion to Dismiss and Motion to Strike	December 23, 2022

1 Respectfully submitted this 15th day of September, 2022

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24 *Attorneys for Plaintiffs*

**ORDER**

IT IS HEREBY ORDERED that Defendants ZoomInfo Technologies LLC, ZoomInfo Technologies Inc., Zoom Intermediate Inc., and ZoomInfo Holdings LLC's deadline to respond to the Amended Class Action Complaint is extended to October 28, 2022. If Defendant files a motion to dismiss/motion to strike, Plaintiffs' response(s) shall be due December 2, 2022. Defendants' replies in support of their motion to dismiss and/or motion to strike shall be due December 23, 2022.

DATED this \_\_\_\_ day of \_\_\_\_\_, 2022.

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David G. Estudillo  
United States District Court Judge